

Title:

Mr

Forename:

Peter

Surname:

Holmes

Representing:

Self

Organisation (if applicable):

Email:

What additional details do you want to keep confidential?:

No

If you want part of your response kept confidential, which parts?:

Ofcom may publish a response summary:

Yes

I confirm that I have read the declaration:

Yes

Additional comments:

Question 1:Do you agree with the proposal to include, as a matter of course, the 470 kHz and 5 MHz bands into the Licence for all Amateur Radio (Full) licensees?:

'No - Not as proposed. I agree that the bands should be made available to all Full Licencees but in exactly the same way as other bands to which amateurs have access on a Secondary basis. The standard wording applicable to other amateur bands should suffice i.e:

"Secondary. Available on the basis of non-interference to other services inside and outside the UK"

Furthermore some of the proposed clauses set concerning precedents that if subsequently applied to other bands would radically change specific aspects of amateur radio in the UK. Of particular concern is Paragraph 2.26.6, which should be omitted entirely, as well as the phrase 'electronic equipment' in 2.26.3

With respect to Paragraph 2.26.6, near-field measurements at these frequencies are very difficult to determine with any accuracy and in any case are irrelevant at the power levels in use. Clause (e) in Notes to Schedule 1 of the existing licence is sufficient and does not need to be reinforced in relation to the 472kHz entry.'

Question 2: Do you agree that expressly linking a Full (Club) Licensee's authorisation to use the spectrum to his or her representation of a named club, and by adding a further ground for revoking the Licence to include circumstances where the licensee no longer represents the club, will help ensure that a club's call sign remains with the club?:

Yes, I fully agree with this

Question 3: Do you agree that Ofcom should include a further ground of revocation in the Licence as proposed above in order better to align Clause 4 with the definition of 'Disqualified Person'?:

Yes, I do

Question 4: Do you agree that the word 'automatically' should be removed from Clause 4(5) of the Licence, in relation to the revocation of the Licence for failure to comply with the revalidation requirements?:

I do not agree with this decision, however I also don't see the point in revoking the license, as the chances of any user with a revoked license being brought to book by OFCOM extremely slim. Moreover, as there is no current way for the general amateur radio community to be sure they are talking to a properly licensed individual, it opens up a whole can of worms regarding breaking of license conditions by speaking to an unlicensed user. However, if these points were addressed then I would be in favour of automatic revocation if not revalidated.

Question 5: Do you agree that Clause 15 of the Licence should be updated to reflect the wording included in Ofcom's General Licence Conditions Booklet?:

Yes

Question 6: Do you agree that Clause 13 of the Licence should be amended to allow for a simpler, more flexible approach for identifying Amateur Radio stations?:

I do not. Currently the clause is quite clear, amending as suggested makes it rather vague. I do agree that "a station must be clearly identifiable at all times and that the identity be given

in a format consistent with the modulation in use" but believe that specific terms such as voice or morse should not be used.

Question 7: Given the current uncertainty amongst Radio Amateur licensees in relation to Clause 2(2), do you believe that it would be a practical solution for Ofcom to remove this Clause and to insert additional wording into Clause 13, as proposed above?:

I very strongly disagree with the suggestion that the clause be removed and additional wording added. As it is very clear, doing what OFCOM propose does nothing only cause confusion, the current practices, being in use now for over 50 years (and is recognised worldwide) have served the amateur radio community well and have at no stage in my opinion caused the sort of confusion that the new proposals would do.

Question 8: Do you agree with Ofcom's proposal to amend Clause 2(3) of the Licence to require Intermediate licensees to transmit a call sign that reflects the location of their main station?:

No, I do not. The current practice offers more clarity. the suggested amendment does nothing but cause confusion. The current clause should be kept as is.

Question 9: Do you agree that replacing Clauses 2(1) and 16(1) with a new Clause to simplify and bring together all of the licence conditions relating to the operation of radio equipment away from the Main Station address will make these provisions clearer?:

I do, however strongly disagree with the prohibition in Clause 9(3) which disallows the "establishment or use of radio equipment in any aircraft or airborne vehicle." This however is not part of the consultation.

Question 10: Do you agree that the proposed changes will clarify RAYNET operation under the Licence?:

I do